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10 ***Liaison Counsel for Plaintiff***

11 ***ADDITIONAL COUNSEL ON SIGNATURE PAGE***

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ROY STRASSMAN, Derivatively on Behalf of  
MARATHON DIGITAL HOLDINGS, INC.  
(f/k/a MARATHON PATENT GROUP, INC.),  
Plaintiff,

Case No.: 2:22-cv-00724

v.

FRED THEIL, GEORGES ANTOUN, KEVIN  
DENUCCIO, SARITA JAMES, JAY LEUPP,  
SAID OUISSAL, MERRICK D. OKAMOTO,  
AND SIMEON SALZMAN,

**DECLARATION OF MARK C. RIFKIN**  
**IN SUPPORT OF MOTIONS**  
**FOR (1) CONSOLIDATION AND**  
**APPOINTMENT OF INTERIM CO-LEAD**  
**COUNSEL AND (2) TO TEMPORARILY**  
**STAY ALL MOTION TO DISMISS**  
**BRIEFING AND MEMORANDUM IN**  
**SUPPORT**

Defendants,

-and-

MARATHON DIGITAL HOLDINGS, INC.  
(f/k/a MARATHON PATENT GROUP, INC.),

Nominal Defendant.

1 I Marc C. Rifkin declare the following:

2 1. I am a resident of the State of New York and a partner at the law firm Wolf  
3 Haldenstein Adler Freeman & Herz LLP.

4 2. I submit this declaration in support of the Motions for (1) Consolidation and  
5 Appointment of Interim Co-Lead Counsel and (2) to Temporarily Stay All Motion to Dismiss  
6 Briefing.

7 3. True and correct copies of the following documents cited in the accompanying Motion  
8 are attached as Exhibits 1 and 2:

9 EXHIBIT DESCRIPTION

10 1. Firm Resume of Wolf Haldenstein Adler Freeman & Herz LLP.

11 2. Firm Resume of Gainey McKenna & Egleston.

12 I declare under penalty of perjury under the laws of the United States of America that the  
13 foregoing is true and correct based upon my knowledge, information and belief.

14 Dated: May 23, 2022

15 /s/ Mark C. Rifkin

16 Mark C. Rifkin

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**DECLARATION OF MARK C. RIFKIN IN SUPPORT OF MOTION FOR (1) CONSOLIDATION, (2)  
APPOINTMENT OF INTERIM CO-LEAD COUNSEL AND TO (3) TEMPORARILY STAY ALL MOTION  
TO DISMISS BRIEFING**